

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
	§	
FIELDWOOD ENERGY LLC, et al.,	§	Case No. 20-33948 (MI)
	§	
Debtors.¹	§	(Jointly Administered)
	§	Re: Docket No. 625

**NOTICE OF FILING REVISED PROPOSED ORDER
PURSUANT TO SECTION 1121(d) OF THE BANKRUPTCY
CODE EXTENDING EXCLUSIVE PERIODS**

PLEASE TAKE NOTICE THAT, on December 1, 2020, Fieldwood Energy LLC and its debtor affiliates in the above-captioned chapter 11 cases, as debtors and debtors in possession (collectively, the “**Debtors**”), filed the *Debtor’s Motion for Entry of an Order Extending Exclusive Periods Pursuant to Section 1121(d) of Bankruptcy Code* (Docket No. 625) (the “**Motion**”), with a proposed form of order granting the relief requested in the Motion attached thereto as Exhibit A (the “**Initial Proposed Order**”).

PLEASE TAKE FURTHER NOTICE THAT, a limited objection to the Motion (the “**Limited Objection**”) was filed by Aspen American Insurance Company, Berkeley Insurance Company, Everest Insurance Company and Sirius America Insurance Company (Docket No. 686) and multiple joinders to the Limited Objection were filed by (i) Hanover Insurance Company, Liberty Mutual Insurance Company, Travelers Casualty & Surety Company of America, and XL

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

Specialty Insurance Company (Docket No. 687); (ii) Lexon Insurance Company and Endurance American Insurance Company (Docket No. 688); (iii) U.S. Specialty Insurance Company and HCC International Insurance Company (Docket No. 690); (iv) Zurich American Insurance Company (Docket No. 693); (v) Philadelphia Indemnity Insurance Company (Docket No. 694); and (vi) RLI Insurance Company (Docket No. 695) (the entities listed in (i) through (vi), together with Aspen American Insurance Company, Berkeley Insurance Company, Everest Insurance Company and Sirius America Insurance Company, the “**Sureties**”).

PLEASE TAKE FURTHER NOTICE THAT, on January 4, 2021, this Court held a hearing on the Motion (the “**Hearing**”).

PLEASE TAKE FURTHER NOTICE THAT, the Debtors hereby file a revised proposed order (the “**Revised Proposed Order**”) granting the relief requested in the Motion, which includes (i) the additional procedures announced by the Court at the Hearing and (ii) certain other additions to the form of order that have been agreed to by the Debtors and the Sureties. A representative for the Sureties and the Creditors’ Committee (as defined in the Motion) have each reviewed and signed off on the Revised Proposed Order.

PLEASE TAKE FURTHER NOTICE THAT, the Revised Proposed Order is attached hereto as **Exhibit A**, and a blackline of the Revised Proposed Order marked against the Initial Proposed Order is attached hereto as **Exhibit B** (the “**Blackline**”).

Dated: January 7, 2021
Houston, Texas

Respectfully submitted,

/s/ Alfredo R. Pérez

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*Attorneys for Debtors
and Debtors in Possession*

Certificate of Service

I hereby certify that on January 7, 2021, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Alfredo R. Pérez

Alfredo R. Pérez